REMARKS

Applicants hereby traverse the outstanding rejections, and request reconsideration and withdrawal in light of the amendments and remarks contained herein. New claims 21-24 have been provided for consideration. Claims 1-24 are pending in this application.

Drawings

FIGURE 3 has been amended to correctly identify the element now labeled 311. Applicants noted that as filed, FIGURE 3 had two elements labeled 307. No new matter has been entered.

Specification

The text of the specification beginning at page 13, line 19 and page 15, line 14 has been amended to correctly identify the element now labeled 311. Applicants noted that as filed, the specification had two elements labeled 307. No new matter has been entered.

The text of the specification beginning at page 15, line 6 has also been amended to correct a minor error. No new matter has been entered.

Rejection Under 35 U.S.C. § 102

Claims 1-20 currently stand rejected under 35 U.S.C. § 102(e) as anticipated by Shambroom, U.S. Patent No. 5,923,756 (hereinafter *Shambroom*).

It is well settled that to anticipate a claim, the reference must teach every element of the claim, see M.P.E.P. §2131. Moreover, in order for a prior art reference to be anticipatory under 35 U.S.C. § 102 with respect to a claim, "[t]he elements must be arranged as required by the claim," see M.P.E.P. § 2131, citing *In re Bond*, 15 US.P.Q.2d 1566 (Fed. Cir. 1990). Furthermore, in order for a prior art reference to be anticipatory under 35 U.S.C. § 102 with respect to a claim, "[t]he identical invention must be shown in as complete detail as is contained in the . . . claim," see M.P.E.P. § 2131, citing Richardson v. Suzuki Motor Co., 9 U.S.P.Q.2d 1913 (Fed. Cir. 1989). Applicants respectfully assert that the rejection does not satisfy these requirements.

As amended, claim 1 includes the elements of "establishing an association of a data entry with said data operative transaction in a destination database," and "preserving said association of said data entry with said data operative transaction in said destination database so long as said transaction is active in said network." The Office Action opines that *Shambroom* specifically discloses the establishment "of an association of a data entry with a transaction in a destination database," and that *Shambroom* specifically discloses "preserving association of data entry with transaction in database so long as transaction is active in network." However, the Applicants respectfully assert that *Shambroom* does not teach these elements, *Shambroom* teaches "client-authenticating information" that associates a data entry with a user's identity, not a data operative transaction. This distinction is made clear at column 4 lines 2-9 where *Shambroom* teaches maintaining the association with the client's identity until the client logs off. Because the association is with the client's identity and not a data operative transaction, the association would remain unchanged through the initiation and cessation of multiple data operative transactions. *Shambroom* does not, therefore, teach every element of claim 1 and the Applicants respectfully request the rejection of claim 1 be withdrawn.

Claims 2-13 depend directly from claim 1 and therefore inherit all of the limitations of claim 1. Claims 2-13 thus include elements not taught by *Shambroom* and the Applicants respectfully request that the rejection of record for claims 2-13 be withdrawn. Claims 2, 7, 9-12 have been amended to correspond with the amendments to claim 1.

As amended, claim 14 includes as an element "a reservation database at said destination site for storing information uniquely identifying said data operative transaction." The Office Action opines that *Shambroom* specifically discloses "a reservation database at destination site for storing information uniquely identifying transaction." However, the Applicants respectfully assert that, at the passage cited, *Shambroom* teaches the creation of records that uniquely identify a user, not a data operative transaction. Further, the Applicants respectfully submit that the systems disclosed by *Shambroom* for enhancing the security of a network connection and do not appear to ever uniquely identify a data operative transaction. *Shambroom* does not, therefore, teach every element of claim 14 and the Applicants respectfully request the rejection of claim 14 be withdrawn.

Claims 15-19 depend directly from claim 14 and therefore inherit all of the limitations of claim 14. Therefore, claims 15-19 include elements not taught by *Shambroom* and the Applicants respectfully request that the rejection of record for claims 15-19 be withdrawn. Claim 18 has been amended to correspond with the amendments to claim 14.

As amended, claim 20 includes the elements of a "means for establishing an association of a data entry with said transaction in a destination database," and a "means for preserving said association of said data entry with said transaction in said destination database so long as said transaction is active in said network." The Office Action opines that *Shambroom* specifically discloses "establishing an association of a data entry with transaction in a destination database," and specifically discloses "preserving association of data entry with transaction in destination database so long as transaction is active in network." However, the Applicants respectfully assert that *Shambroom* does not teach these elements, *Shambroom* teaches "client-authenticating information" that associates a data entry with a user's identity, not a data operative transaction. This distinction is made clear at column 4 lines 2-9 where *Shambroom* teaches maintaining the association with the client's identity until the client logs off. Because the association is with the client's identity and not a data operative transaction, the association would remain unchanged through the initiation and cessation of multiple data operative transactions. *Shambroom* does not, therefore, teach every element of claim 20 and the Applicants respectfully request the rejection of claim 20 be withdrawn.

Conclusion

New claims 21-24 are presented for consideration by the Examiner. New claims 21-23 depend directly from base claims 1, 14, and 20, respectively, and thus inherit all limitations of their respective base claims. No new matter has been entered. New claims 21-24 set forth features and limitations not recited by the prior art of record. Thus, the Applicants respectfully assert that new claims 21-24 should be indicated as being allowable over the prior art of record.
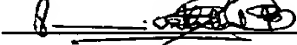
In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 08-2025, under Order No. 10992150-1 from which the undersigned is authorized to draw.

I hereby certify that this correspondence is being deposited with the U.S. Postal Service as Express Mail, Airbill No. EV256029615US, in an envelope addressed to: MS Amendment, Commissioner for Patents, PO Box 1450, Alexandria, VA 22313-1450, on the date shown below.
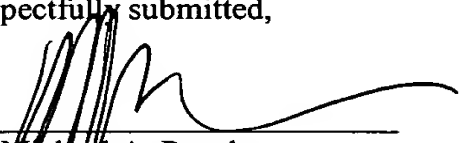
Date of Deposit: October 21, 2003

Typed Name: John Pallivathukal

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Respectfully submitted,

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